

MELINDA HAAG (CABN 132612)  
United States Attorney  
DAVID R. CALLAWAY (CABN 121782)  
Chief, Criminal Division  
THOMAS NEWMAN (NYBN 4256178)  
Assistant United States Attorney  
1301 Clay Street, Suite 340 S  
Oakland, California 94612-5217  
Telephone: (510) 637-3689  
Fax: (510) 637-3724  
Thomas.newman2@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA,	)	Case No. CR-15-00015-JST
	)	
Plaintiff,	)	STIPULATION TO CONTINUE AND TO
	)	EXCLUDE TIME
v.	)	
	)	
KENNETH BROWN,	)	
	)	
Defendants.	)	

The parties stipulate as follows:

1. A status conference is set in this matter for June 26, 2015, at 9:30 am. For the reasons stated below, the parties stipulate to continue this matter until July 23, 2015, at 9:30 am and to exclude time under the Speedy Trial Act.

2. Defendant Kenneth Brown is continuing to review the discovery in this matter and discuss the case with government counsel. The parties have also reached a potential resolution of the case and request to continue the case until July 23, 2015, at 9:30 am for a change-of-plea hearing. During this period, the defense will continue to review the discovery.

3. For the reasons stated above, the parties agree to continue this matter until July 23, 2015, in order to permit the defendants additional time to review the discovery and conduct an investigation of this case. The parties further stipulated to exclude time under the Speedy Trial Act from June 26, 2015, until July 23, 2015, in order permit defense counsel time to review the discovery pursuant to 18 U.S.C. §

1 3161(h)(7). The parties also agreed that the ends of justice served by granting such a continuance  
2 outweigh the best interests of the public and the defendants in a speedy trial. 18 U.S.C. § 3161(h)(7).

3  
4 DATED: June 25, 2015

Respectfully submitted,

5 MELINDA HAAG  
United States Attorney

6 /s/  
7 THOMAS M. NEWMAN  
Assistant United States Attorney  
8 Tax Division

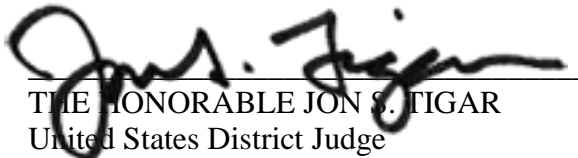
9 /s/  
10 ETHAN A. BALOGH  
Attorney for Defendant Kenneth Brown

ORDER

PURSUANT TO THE PARTIES' STIPULATION this matter is continued until July 23, 2015, at 9:30 am and an exclusion of time is warranted from June 26, 2015 through July 23, 2015, because the ends of justice served by the continuance outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A). The failure to grant the requested continuance would deny the defendant effective preparation of counsel, and would result in a miscarriage of justice. 18 U.S.C. § 3161(h)(7)(B)(iv).

IT IS SO ORDERED.

DATED: June 25, 2015

  
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THE HONORABLE JON S. TIGAR  
United States District Judge